

Solutia Inc.

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May 10, 2000


Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
• **May 2000 Monthly Report**

Dear Mr. McAteer,

Enclosed is the May 2000 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,


D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

T. Gouger - USACE
C. Morin - IEPA
Mayor M. King - Cahokia
Sauget File - Solutia
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: May 10, 2000
Period Covered: April 1, 2000 - April 30, 2000
Next Report Period: May 1, 2000 - May 31, 2000

Work Performed during the reporting period

All required field work for the Sauget Area 1 Support. Sampling Plan ("SSP") was completed by April 30, 2000, consistent with the SSP schedule.

1. Continued collection of downgradient and upgradient alluvial aquifer samples.
2. Continued collection of groundwater level readings.
3. Completed bedrock well casing installation on Site I.
4. Completed bedrock well soil profiling at Site G.
5. Received USEPA approval and completed implementation of the Developed Area Soil Sampling Plan.
6. Performed slug tests on piezometers adjacent to Sites, G, H, I, L and N.
7. Conducted leachate sampling on Sites G and I for pilot / treatability testing.
8. Collected pilot test waste sampling at Sites G, H & I.
9. Completed surveying for ecological sampling.

Data Submittal (Copy to M. McAteer only)

- There is no data to report this period.

Work scheduled for next reporting period

With the completion of the field work required by the SSP, work in the field during the next report period will consist primarily of properly disposing of waste materials collected during the course of the investigatory Work and demobing from the Site. The Sauget Team will now focus on completing sample analyses, completing data validation and beginning compilation / interpretation of the data.

Problems and Solutions

1. In a March 16, 2000 letter to EPA, Solutia requested permission to replace the Data Validation Plan prepared by Environmental Standards, Inc. ("ESI"), identified as Volume 4 of the approved September 9, 1999 Support Sampling Plan, with a February 2000 Data Validation Plan, Volumes I and II, prepared by O'Brien & Gere ("OBG"). This change request was necessitated when Solutia was unable to reach agreement with ESI on the scope and cost of data validation, management and mapping for Sauget Area I Support Sampling Plan. As a result of these disagreements, Solutia solicited competitive bids and selected OBG based on the quality of their proposal, experience of their team and competitive price for data validation, management and mapping. Solutia believes there are no substantial differences between the two plans. This request remains under review by EPA.

Submittal Schedule Status

See attached schedule - consistent with the approved SSP - as revised where indicated.

Issues under review

1. **UAO to address flooding**

Background

U. S. EPA UAO - Docket No. V-W-99-C-554 - dated June 21, 1999 was issued to Solutia and received June 28, 1999. The UAO requires a time critical removal action to replace the culverts on Dead Creek to address flooding of Dead Creek. An alternative time critical removal proposal to address the cause of the flooding and the contaminated sediments directly was made to U. S. EPA by Solutia July 8 at a conference in Cahokia. This proposal was formally submitted to U. S. EPA in Solutia's July 17, 1999 Response to the UAO. As committed to in the July 8 Cahokia conference and repeated in Solutia's July 17, 1999 Response, Solutia submitted to U.S. EPA in a July 30, 1999 correspondence, commitment to implement some additional short term plans to address the flooding and the sediments under the UAO. The Agency responded to Solutia's proposals in a September 24, 1999 letter. In summary, the Agencies approved replacement of the culverts at Cargill Road and the Terminal Railway ROW; requested a work plan for the proposed installation of facilities to pump water from Sector B to the American Bottoms Treatment plant; and agreed conceptually and requested additional discussions and information on the proposal to remove contaminated

sediments from Sector B and contain in an on-site double lined containment cell. On November 8, 1999, Solutia submitted an evaluation of alternatives to an on-site containment cell for dealing with the contaminated sediments from Sector B.

After an Order was issued to Terminal Railroad, Solutia successfully concluded negotiations of an access agreement with Terminal Railroad on February 9, 2000, allowing Solutia to enter the property to perform the UAO required Work at the Terminal RR crossing. The geotechnical investigatory work for culvert replacement was completed immediately thereafter. Solutia also began to perform the clearing and grubbing portion of the Work on February 28, 2000.

Solutia completed the design of the culverts replacement project in March and obtained approval of U. S. EPA. Solutia also submitted the project design plans in March for review by the County, the Village of Cahokia, Laclede Gas, and Phillips Petroleum.

This Report Period

As a result of the April review of the culverts design by the County, the Village, Laclede Gas and Phillips Petroleum, modifications were required and have been made. The redesigned culverts are now ready for review again. This review is scheduled for mid-May. Work will begin upon agreement by all parties on the final design. This is expected to occur in late May.

With respect to the Dead Creek sediment removal and on-site containment cell project, Solutia and USEPA continued to discuss the appropriateness of the Solutia proposal. No final determination has yet been made by the Agency.

Plans for Next Report Period

1. Obtain approval of the culvert replacement design the County and Terminal Railway, Phillips Petroleum and Laclede Gas. Procure materials for the culvert replacement and begin construction.
2. Await U. S. EPA determination on the Dead Creek Sediment Removal UAO.

Comments:

None

January 21, 1999 Sauget Area I AOC
SCHEDULE

(11/99 Revision)

- | | |
|---|---|
| 1. Designation of Contractor | Completed 3/10/99 ¹ |
| 2. Designation of Other Contractors | 5 Business Days Before Start
of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted February 22, 1999 |
| 5. Submit Revised SSP | April 8, 1999 ²
June 25, 1999 ³
August 13, 1999 ⁴
September 9, 1999⁵ Approval |
| 6. Obtain Access Agreements | July 1, 1999 ⁶
September 17, 1999 ⁷
October 1, 1999 ⁸ |
| 7. Submit Health and Safety Plan (HASP) | Approved September 9, 1999 |
| 8. Submit Quality Assurance and
Sampling Plan (QAPP) | Approved September 9, 1999 |

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ June 25th SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

⁵ August 13, 1999 SSP submittal as revised August 30, 1999 and September 7, 1999 received final Agency approval on September 9, 1999.

⁶ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁷ Access agreements update issued August 15, 1999 with request to extend deadline to September 17, 1999. Extensions to September 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

⁸ Access agreements update issued September 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a September 21, 1999 e-mail to Mike Light

January 21, 1999 Sauget Area I AOC

SCHEDULE (Cont.)
(11/99)

9. Sampling Notification	10 Business Days Prior to Start of Work ⁹
10. Submit Data Report	01/09/01 ¹⁰
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal - 03/09/01
12. Submit Revised EE/CA Report	21 Calendar Days After Receipt of EPA Comments
13. Submit RI/FS Report	90 Calendar Days After Data Report Submittal - 04/09/01
14. Submit Revised RI/FS Report	21 Calendar Days After Receipt of EPA Comments
15. Progress Reports	Monthly Beginning February 19, 1999 ¹¹

⁹ Notification given on August 19, 1999 that Air Sampling will begin on September 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

¹⁰ Per SSP - 16 mo. from SSP approval date of 9/9/99.

¹¹ Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10th of the month.